

NATIONAL PARKS CONSERVATION ASSOCIATION

Protecting Parks for Future Generations

September 7, 2001

Chas Cartwright, Superintendent
Devils Tower National Monument
PO Box 10
Devils Tower, WY 82714

Dear Superintendent Cartwright,

We are pleased to submit comments on the draft General Management Plan for Devils Tower National Monument.

In our view the preferred alternative includes a number of significant and thoughtful steps toward long-range improvement of visitor experience as well as protection of critical park resources. We applaud you for many of the recommendations that have been put forth, and look forward to assisting DETO in their eventual implementation.

Specifically, NPCA/NRRO believes your recommendation to institute a shuttle transit system correctly addresses one of the Monument's most significant challenges – that of automobile congestion in the Monument during peak times. Additionally, we support the recommendation to eliminate the campground in the Belle Forche floodplain and also your plans to restore various developed and paved areas to their more natural settings. All these and other changes reflect your thoughtful consideration of the many good suggestions offered during the scoping process.

That being said, we also believe that the preferred alternative (Alternative 3) can and should be improved prior to final adoption. In our view, several significant areas that are core to long-term protection of DETO's natural and cultural values (indeed to the very purposes for which the park was initially designated) remain under-addressed. With some further adjustments in directions already chosen and recommended, the GMP could be significantly strengthened in its final form.

With that in mind, NPCA respectfully requests that DETO consider our further thoughts and recommendations for strengthening this plan in two key areas: 1) Cultural Interpretation and 2) the proposed Shuttle Transit System.

Cultural and Historic Interpretation

There has been some improvement in recent years (following implementation of the Climbing Management Plan) in regards to the amount of emphasis placed by the park and allowed by NPS for rock climbing activities and its cultural position in the unit's historic

Received
Devils Tower NM

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context. However, we strongly believe more work needs to be done to further limit both the activity and what we believe is a highly overemphasized context within the unit's interpretative priorities. Specifically, NPCA does not believe that the sport of rock climbing nor its recent emergence as an activity associated with the Tower's history deserve anywhere near the emphasis provided by NPS both in the extent to which the activity is provided access to the Tower nor to the degree to which the activity is prominently featured in interpretative displays.

Devils Tower's rich spiritual history as associated with the tribes of the Northern Plains is the true interpretative cultural story of the Tower. The globally unique geologic features and natural landscape values sit equally side by side with the Native American history as the primary twin assets and core values associated with the unit. As you are aware our country's first national monument in 1906 was not based upon its rock climbing challenges, but rather upon its deep cultural significance, unique geological assets, and natural landscape.

Various sections of the plan mention the monument's cultural and spiritual significance to native peoples, as on page 4: "The Tower is sacred to many peoples. It figures prominently in the belief systems and narratives of northern Plains Indians." However, the preferred alternative does not provide a specific and detailed plan for creating a full and prominent context for DETO interpretative exhibits of Native American values and history. We believe it should.

In addition to listing the facilities that will be available, such as "interpretive exhibits, benches, an interpretive area, and walkways (p.36)," we suggest that language be added to include specific information about the nature and context of the interpretation planned, and that the addition clearly state the importance and priority to be placed on Native American activities. When I recently visited DETO, I was struck by the degree to which 100 years of rock climbing disproportionately capture visitor attention through extensive displays at the visitor center while overshadowing thousands of years of indigenous peoples' use and value in the area. NPCA believes this imbalance should be assertively addressed and corrected through adoption of proactive directions and measures in the GMP. We believe that DETO can accomplish this without conflicting with management directions stipulated in the Climbing Plan. Indeed, the Climbing Management Plan provides some good examples of ways the Monument can improve cultural interpretation as exemplified in relevant sections on pages 15-16. Referencing Native American sections here could align with our recommendations.

In short, the preferred alternative must specifically address the imbalance in interpretation, stating clearly that American Indian cultural and sacred traditions will be given greater attention in signage, interpretive plaques, publications and handouts, artistic displays, books, and public programming, for instance.

Alternative Transit System & Associated Management Steps

We are particularly pleased and supportive of the preferred alternative's recognition for and adoption of an alternative transit system. Clearly the current levels of traffic

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congestion, noise, and pollution within the monument at peak times has become unacceptable in regards to its deleterious impacts on overall visitor experience. The implementation of a shuttle transit system to decrease crowding, traffic and pollution in Devils Tower is a splendid improvement, one that is being studied and implemented in other park units around the country.

The shuttle system is an excellent change that will keep vehicles away from the Tower area and improve visitors' experience immeasurably. Eliminating the campground and other facilities in the Belle Fourche River floodplain will also decrease crowding and the need for vehicular access into the monument, while also ensuring the safety of campers who shouldn't be staking tents in the floodplain to begin with. The conversion of the paved parking area at the Tower into a landscaped pedestrian plaza and conversion of two-track dirt roads into one-track trails is also a tremendously important component of this plan, which will have longterm benefits for wildlife, watershed management, and visitors' experience of the true natural setting of this monument.

To truly optimize an integrated vision for meeting these new and emerging visitation demands, however, we believe DETO needs to add greater specificity and direction to its current recommendations in this section of the plan. In particular we are deeply disappointed in the fact that bicycle transportation options have been largely dismissed and ignored within the DETO plan. The current NPS direction throughout the nation in many units addressing vehicular congestion is to put forth comprehensive and integrated transportation plans that include mixes and matches of shuttle, bike, and pedestrian options for reaching important destination points. The groundbreaking transit system in Zion is one example, and the emerging plan for Grand Teton National Park is another in which transit systems are multi-dimensional.

NPCA strongly encourages if not implores DETO to amend the current preferred alternative to include a dedicated bike/pedestrian path to follow the road from the entrance to the visitor center. We believe this landscape is ideally suited to such a pathway and provides a short yet rich visitor opportunity to access the park that many, many visitors will take advantage of. The cost to site and maintain such a pathway would prove minimal in comparison to what implementation and maintenance of a transit system will cost. A separate pathway will also greatly alleviate safety concerns and issues associated with bike use on the existing road. The shuttle buses should be designed to allow bicyclists to use the shuttle if they wish, with on-shuttle transport of bicyclists and their bikes to or from the Tower. In addition to the visitor amenities mentioned in the preferred alternative, the staging area, pedestrian plaza, and other key areas should be supplied with secure bike racks.

In summary, we strongly urge DETO to adjust the GMP to add a thoughtful integration of bicycle and pedestrian pathways and to specify exactly how bicycles and their riders fit into the proposed transit system.

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Zoning and Climbing Management in the GMP

We understand that the 1995 Climbing Management Plan will be revisited soon after the Devils Tower NM GMP is adopted. In the interim, we wish to comment on the appropriate management of climbing activities that also falls under the GMP. The Special Protection Zone that comprises the Tower and a large area in the northwest corner of the monument that allows managers to tighten restrictions for resource protection and opportunities for quiet and solitude is strongly supported by NPCA, since this represents exactly what parks and monuments were created to do: protect the resource for present and future generations, and allow for a restorative and enriching natural experience.

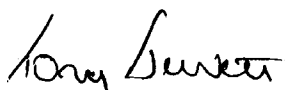
To that end, we would like to see the Special Protection Zone explicitly prohibit climbing activities year-round, so that a section of the tower is set aside for non-climbers to enjoy without intrusion of the sport on their experience of the Tower. Rather than defer to the Climbing Plan, the GMP should devote more space to explaining where and when climbing is restricted or prohibited, without going into extensive detail or beating around the bush. Under the "Visitor Experience" category the zone is identified as being "limited to low impact activities compatible with the natural setting and ethnographic character. Registration or permit would be required. Uses would be managed intensively, and many restrictions might apply (pg. 26)." As we read this zoning provision, climbing can and should be strictly limited or prohibited from areas zoned as Special Protection areas.

Carrying Capacity Study

Proposed changes in the preferred alternative are designed to remedy the impacts of increased visitation and crowding, and park visitors nationwide are becoming aware of the need to monitor and control to some degree the human impacts on these natural areas. To do this, the Overall Concept section should specify just how the results of the study will be worked into management goals. On page 13 in the Laws, Policies and Mandates section, the plan says that "the National Park Service will undertake detailed planning to establish visitor carrying capacity strategies and monitoring programs." To clarify this issue in the preferred alternative, it would be helpful to include the following statement on page 13 that reads, "If the Final Management Plan includes the development of a shuttle system, the carrying capacity will be undertaken as part of the planning and design of the system."

In closing, I want to thank you and the planning team again for your efforts to improve and protect the Tower's unique resources. If properly done, the unit's great natural and cultural assets will be enhanced and preserved, and with them lasting opportunities for a quality visitor experience.

Sincerely,



Tony Jewett
Senior Regional Director